

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESTHER WILDER,

Plaintiff,

-v-

SARAH HOILAND,

Defendant.

1:22-cv-01254-PKC

**SUPPLEMENTAL DECLARATION
OF SARAH HOILAND**

SARAH HOILAND declares under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am the defendant in this action. I submit this supplemental declaration in further support of my motion for summary judgment.

2. In her submissions to the Court, Dr. Wilder references “research results,” and the NSF Proposal¹ states that “results” of the NICE Project “will be presented at conferences.” The referenced research concerned evaluating the effectiveness of the NICE Program to assess whether, and to what extent, it met its goals. This was done, or intended to be done, through various methods, including testing, surveys and anecdotal evidence on topics such as whether Faculty Participants: (a) improved their own QR skills; (b) placed greater emphasis on QR in their course instruction after completing the NICE Project; (c) became familiar with new strategies for teaching QR; and (d) generally found the course to have been effective or useful.

3. In my view, one cannot give an effective presentation on research results from the NICE Project without focusing the presentation on the NICE Project itself and its associated units

¹ Capitalized terms that are not defined in this affidavit have the meanings given to them in Defendant’s moving papers.

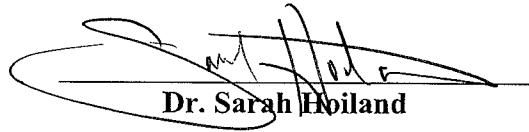
and course materials. In my view, it is not useful to tell conference attendees, for example, that Faculty Participants found the course to be useful without first telling them about the NICE Project and the Course Materials.

4. I participated with Dr. Wilder in a conference presentation in which Dr. Wilder spoke about the NICE and NICHE Projects and certain research results from the NICHE Project. A copy of the PowerPoint slides from that presentation is attached to the Wilder Declaration as Exhibit 16. (*See* Dkt. No. 37-1.)

5. As can be seen from the PowerPoint slides, Dr. Wilder focused the presentation on the NICE and NICHE Projects themselves, including discussion of numeracy and issues relating to numeracy, with a lesser focus on research results that Dr. Wilder had obtained when she ran the NICHE Project. The first 22 slides relate to the NICE and NICHE Projects themselves, including slides relating to numeracy and issues and problems relating to numeracy. The last three slides address research results from the NICHE Project, including test results, survey results and individual anecdotes (D0526-528.)

6. My CCCLA Slides followed a very similar format. One difference though was that, at that time, I did not have final research results because several Faculty Participants had not yet completed the course. I did, however, include test results from Faculty Participants and anecdotes from students about their perception of the QR materials I used in my own classroom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Dr. Sarah Holland